

Appendix “C”

Public Comments and Responses

1. Metropolitan Water District of Southern California, Subject: MDAQMD Notice to Comply 4421, 3M Scotchkote Spray System HSS-450, July 29, 2015. (Attachments included in this letter have not been included but are available upon request. Attachments: MDAQMD NTC; 3M Scotchkote Spray System HSS-450; SCAQMD Preliminary Draft Staff Report for Proposed Amended Rule 1107 – Coating of Metal Parts and Products, July 2012; SCAQMD Proposed Amended Rule 1107 – Coating of Metal Parts and Products; SCAQMD Rule 219 – Equipment Not Requiring a Written Permit Pursuant to Regulation II, Amended May 3, 2013.
2. USEPA email, Subject: MDAQMD and AVAQMD Rules 219, January 22, 2016.
3. USEPA email, Subject: MDAQMD Rule 219 Preliminary Draft, February 9, 2016
4. MDAQMD email, Subject: Rule 219 – Steam Cleaners, May 5, 2016
5. MWD email, Subject: Proposed Amendments to MDAQMD Rule 219, Questions re: Steam Cleaners and Plasma Arc Cutters, May 13, 2016.
6. EPA email, Subject: Proposed Amendment of MDAQMD Rule 219 – Equipment Not Requiring a Permit, May 13, 2016.
7. Lockheed Martin Aeronautics Company: Proposal to Amend Rule 219 – Equipment Not Requiring a Permit, May 19, 2016.

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1. Metropolitan Water District of Southern California
comment letter, July 29, 2015



THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

Office of the General Manager

July 29, 2015

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Bret Banks
Deputy Director Antelope Valley Operations
Mojave Desert Air Quality Management District
14306 Park Avenue
Victorville, California 92392-2310

Dear Mr. Banks:

MDAQMD Notice to Comply 4421, 3M Scotchkote Spray System HSS-450

This correspondence is a follow-up to the July 27, 2015 conversation last week between you and Ms. Carol Kaufman of my staff, regarding Notice to Comply (NTC) 4421, which was issued subsequent to the June 10, 2015 inspection of the Metropolitan Water District of Southern California (Metropolitan), Gene Pumping Plant. The NTC requests compliance verification of the transfer efficiency for the 3M Scotchkote Spray System HSS-450 (Spray System) with MDAQMD Rule 1115, to be followed by applicable permitting.

To address the NTC, in the July 27th discussion you were receptive to reviewing the applicability of the latest South Coast Air Quality Management District (SCAQMD) rulemaking activities for Rule 1107, Coating of Metal Parts and Products. In their 2012 rulemaking, SCAQMD proposed added flexibility to allow other spray equipment options for high viscosity coatings, and recommended that high viscosity coatings be exempt from the transfer efficiency requirements. The 3M Spray System falls under these criteria, as it is dedicated to the application of 3M Liquid Epoxy Coating 323, which is a 100% solids epoxy coating with a VOC content as mixed of 12 g/L. Additionally, in permitting the high viscosity, high solids coating application equipment, SCAQMD has taken the approach of not requiring permits for coating equipment that has VOC emissions of three pounds per day or less or 66 pounds per calendar month or less. Therefore, in alignment with the SCAQMD's approach, we are asking that the 3M Scotchkote 323 Spray System similarly not be subject to the MDAQMD metal parts coating transfer efficiency and permitting requirements.

Background

The Spray System utilizes a dual-cartridge setup along with unique application equipment designed specifically to spray apply the 100 % solids epoxy coating, Scotchkote 323. The novel system is designed to improve application efficiency, and can provide high build in one pass up to 45 mils (1150 microns). As compared to standard application methods, this can effectively reduce the need for additional coats up to four times. Attachment 1 is the brochure describing the 3M Scotchkote Spray System HSS-450 Spray System.

In recognition of the Spray System's improved application efficiency combined with the high viscosity and low VOC content of the Scotchkote 323, SCAQMD's proposed and existing rule requirements are as follows below.

Transfer Efficiency:

To date no formal transfer efficiency information has been available from either 3M or the Spray System manufacturer, Plas-Pak Industries. However, the properties of the high viscosity coatings and their application equipment were recognized during the SCAQMD 2012 rulemaking activities to amend Rule 1107. In their July 2012 Proposed Amended Rule (PAR) 1107 (Attachment 2), the following was proposed:

(f) Exemptions (8) *The provisions of paragraph (c)(1)* shall not apply to metal coatings with a viscosity of 650 centipoise or greater, as applied.*

* (c)(1) refers to approved operating equipment, including HVLP guns, and guns with specific transfer efficiencies.

In further reference to transfer efficiency, the SCAQMD July 2012 PAR 1107 Preliminary Draft Staff Report (page 9) (Attachment 3) states that, *"The options available for coating application equipment will be expanded for high viscosity coatings. Flexibility will be provided for shops that are able to document that alternative application equipment would reduce emissions beyond HVLP spray technology. Some coating properties such as high solids content may make HVLP spray application impractical without additional thinning. Facilities may submit a plan providing for the District to review and allow other spray techniques where the use of HVLP equipment would result in greater emissions. Additionally, an exemption will be included for high viscosity coatings."*

Permitting:

In recognition of the properties of high viscosity coatings, SCAQMD Rule 219, Equipment Not Requiring a Written Permit Pursuant to Regulation II, (I)(6) (Attachment 4), exempts the following:

"Coating or adhesive application or laminating equipment such as air, airless, air-assisted airless, high volume low pressure (HVLP), air brushes, electrostatic spray equipment, roller coaters, dip coaters, vacuum coaters, flow coaters and spray machines provided that:

(A) the VOC emissions from such equipment (including clean-up) are three (3) pounds per day or less or 66 pounds per calendar month or less".

Attachments

In support of our request, the following documents are attached:

1. MDAQMD Notice to Comply No. 4421, Dated 7/15/15
2. 3M Scotchkote Spray System HSS-450 Manufacturer Information (14 pages)
3. SCAQMD Preliminary Draft Staff Report for Proposed Amended Rule 1107 – Coating of Metal Parts and Products, Highlighted Text on Pages 2, 9, 14, 37, 56-58 (23 pages)
4. SCAQMD Proposed Amended Rule 1107 – Coating of Metal Parts and Products (21 pages)
5. SCAQMD Rule 219 – Equipment Not Requiring a Written Permit Pursuant to Regulation II (6 pages)

Mr. Bret Banks
Page 3
July 29, 2015

1

We appreciate your review of our request to resolve the NTC. The Spray System's efficient design, in conjunction with the high viscosity and low VOC content of the Scotchkote 323 coating, merit alignment of the transfer efficiency and permitting requirements with SCAQMD's approach.

If you have any questions or require additional information, please contact Ms. Carol Kaufman at (213) 217-6207.

Very Truly Yours,



Daniel J. Guillory
Manager, Environmental Program Support Team

S:\SES corres\Kaufman,Carol\ R-15-64 MDAQMD NTC 4421 MWD Reply7-29-15.doc

Attachments

cc: Mr. Alan De Salvio, Deputy Director Mojave Desert Operations, MDAQMD
Mr. Daniel Concho, Air Quality Specialist, MDAQMD
Ms. Roseana Navarro-Brasington, Air Quality Engineer, MDAQMD

1. District response to Metropolitan Water District of Southern California comment
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1. Rule 219 is proposed for amendment to include SCAQMD Rule 219 transfer efficiency language. Please refer to Rule 291 §(E)(13)(o). Rule 1115 will be amended in a separate action.

2. USEPA email comment, January 22, 2016

Tracy Walters

From: Maurin, Lawrence <Maurin.Lawrence@epa.gov>
Sent: Friday, January 22, 2016 2:27 PM
To: Tracy Walters
Cc: TSAI, YA-TING
Subject: MDAQMD and AVAQMD Rules 219

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Tracy,

I am currently evaluating the 2010 submittal of Mojave Desert's Rule 219 and the 2011 submittal of Antelope Valley Rule 219 for SIP approval. I have looked through the staff report and have seen how you had incorporated comments that Laura Yannayon had submitted to you in 2010 prior to the adoptions of the rules.

We have since learned that CARB has provided some more detailed interpretation on the provisions in Senate Bill 700 relating to the permitting thresholds for minor agricultural sources. SB700 requires districts in California to permit agricultural sources with actual emissions at or above one half the major source threshold and prohibits districts from permitting agricultural sources with actual emissions less than one half the major source threshold. CARB had never defined which major source threshold should be referred to for permitting agricultural sources ((1) the SIP-approved threshold, (2) the most recent locally adopted threshold, or (3) the threshold corresponding with the current federal attainment status in 40 CFR 81.305). CARB has clarified that the permitting threshold for minor agricultural sources should be the most stringent of any major source threshold.

We are asking districts in California to revise their permit exemption rules in accordance with this new interpretation because most agricultural source exemption thresholds do not correspond with some SIP or locally adopted major source thresholds. EPA cannot approve into the SIP the rules which contain this discrepancy.

1 → San Joaquin Valley APCD has already made this revision, and South Coast AQMD and San Diego County APCD are in this process. We would like to ask Antelope Valley AQMD and Mojave Desert AQMD take steps to revise paragraphs (B)(3) and/or (D)(2)(b) and resubmit their respective versions of Rule 219 for SIP approval.

I would recommend taking a look at the language in San Joaquin Valley APCD Rule 2020, paragraph 6.20 for language that we would consider approvable for minor agricultural source exemptions. This language allows the major source thresholds to change, but will not affect the validity of the minor agricultural source exemption in Rule 219.

Please let me know if you have any thoughts. I'd be happy to have some further discussion on this request.

Thank you,

Larry

Larry Maurin
Air Permits Office (AIR-3)
U.S. Environmental Protection Agency, Region 9
75 Hawthorne Street
San Francisco, CA 94105

(415) 972-3943 (phone) / (415) 947-3579 (fax)
Maurin.Lawrence@epa.gov

2. District response to USEPA email

1. Please see Rule 219 §(D)(2)(b) for proposed updated language.

3. USEPA email comment, February 9, 2016

Tracy Walters

From: Maurin, Lawrence <Maurin.Lawrence@epa.gov>
Sent: Tuesday, February 9, 2016 9:58 AM
To: Tracy Walters
Cc: Compliance; Stationary Sources; Karen Nowak; csutkus@arb.ca.gov
Subject: RE: MDAQMD Rule 219 Preliminary Draft

Hi Tracy,

Thank you for the opportunity to review the proposed changes to MDAQMD Rule 219. I had a chance to look at the changes and have one recommendation.

1

I would suggest changing some of the language in the proposed Section (D)(2)(b) to be more consistent with the existing definition of Agricultural Facility in MDAQMD Rule 219 and with the existing language in Section (B)(3). I would recommend revising the proposed Section to read as follows:

(D)(2)(b): To be eligible for exclusion from permitting requirements pursuant to section (B)(3)(a), an Agricultural Facility must, in aggregate, produce actual emissions less than one half (1/2) of the major source thresholds. For the purposes of determining permitting applicability, fugitive emissions, except fugitive dust emissions, are included in determining aggregate emissions.

I have no comments on the other two proposed changes. Are there plans to revise Rule 219 for AVAQMD as well? Please let me know if you have any questions.

Thanks again,

Larry

Larry Maurin
Air Permits Office (AIR-3)
U.S. Environmental Protection Agency, Region 9
75 Hawthorne Street
San Francisco, CA 94105
(415) 972-3943 (phone) / (415) 947-3579 (fax)
Maurin.Lawrence@epa.gov

From: Tracy Walters [<mailto:twalters@mdaqmd.ca.gov>]
Sent: Monday, February 01, 2016 4:13 PM
To: Compliance <Compliance@mdaqmd.ca.gov>; Stationary Sources <StationarySources@mdaqmd.ca.gov>; Maurin, Lawrence <Maurin.Lawrence@epa.gov>; Karen Nowak <k2nowak@mdaqmd.ca.gov>; csutkus@arb.ca.gov
Subject: MDAQMD Rule 219 Preliminary Draft

Good Afternoon,

Please find attached a preliminary draft of MDAQMD Rule 219. There have been several changes requested. Please see specifically:

1. (D)(2)(b): This change is at the request of USEPA. Proposed language is derived from SJVUAPCD Rule 2020 as suggested by USEPA.
2. (E)(6)(e): Engineer request, derived from SCAQMD Rule 219.
3. (E)(13)(o): Industry request, derived from SCAQMD Rule 219.

Please review the proposed changes and direct any questions or comments to me ASAP, but no later than 02/16/2016. If you need additional time, please let me know. This is only the preliminary draft, and there will be further opportunity for review and comment.

Thank you,

Tracy Walters, R.E.H.S.
Lead Air Quality Planner
(760) 245-1661 x6122
www.mdaqmd.ca.gov

3. District response to email

1. The District used language as suggested.

4. MDAQMD email comment, May 5, 2016

Tracy Walters

From: Alan De Salvio
Sent: Thursday, May 5, 2016 10:42 AM
To: Kaufman,Carol Y; Tracy Walters
Cc: Guillory,Dan; Bell,Janet J; Fang,Anthony C
Subject: RE: Rule 219 -- Steam Cleaners

Diesel burner would not have been exempt and continue to not be exempt

From: Kaufman,Carol Y [<mailto:cykaufman@mwdeh2o.com>]
Sent: Thursday, May 05, 2016 10:37 AM
To: Tracy Walters
Cc: Alan De Salvio; Guillory,Dan; Bell,Janet J; Fang,Anthony C
Subject: RE: Rule 219 -- Steam Cleaners

Hi Tracy,

Thanks for following up on this question with Alan. In addition to any engine that might run the steam cleaner, the other aspect of steam cleaning that I wanted to confirm involves the burner that is used to generate the steam. Per the existing rule, not only is steam cleaning (without any clarification) exempt, but also exempt is:

(2) Combustion and Heat Transfer Equipment, (b) General Combustion Source - Any combustion equipment that has a maximum heat input rate of less than 2,000,000 Btu (504,000 kilogram calories) per hour (gross) and is equipped to be fired exclusively with Public Utilities Commission regulated natural gas, liquefied petroleum gas or any combination thereof. The ratings of all combustion equipment used in the same process will be aggregated to determine whether this exemption applies.

1



If I'm reading the existing rule properly, this latter exemption would also have covered a < 2 MBtu diesel burner that would have been used to generate the steam. However, with the proposed wording in the Rule, steam cleaners with diesel burners, regardless of the Btu, will now be required to obtain a permit. Is that correct?

If this is the case, it might be helpful to consider the following: SCAQMD currently only requires a registration per Rule 222 (not a full permit) for these types of burners (see excerpt language below). However, I'm not sure how this might work with MDAQMD rules...

Rule 222 (Cont.)**(Amended May 3, 2013)**

utility, electricity or natural gas is available within a ½ mile radius, has a manufacturer's rating of 100 brake horsepower or less, and are fired exclusively on diesel #2 fuel.	
Micro-Turbines, with a rated maximum heat input capacity of 3,500,000 Btu per hour or less, provided that the cumulative power output of all such engines at a facility is less than two megawatts, and that the engines are certified at the time of manufacture with the state of California or were in operation prior to May 3, 2013.	5/3/2013
Portable Diesel Fueled Heaters, with a rated maximum heat input capacity of 250,000 Btu per hour or less and are equipped with burner(s) designed to fire exclusively on diesel #2 fuel.	5/3/2013
Power Pressure Washers and Hot Water or Steam Washers and Cleaners, that are equipped with a heater or burner that is designed to be fired on diesel fuel, has a rated maximum heat input capacity of 550,000 Btu per hour or less, is equipped with a non-resettable chronometer, and the maximum NOx emission output of the equipment is less than one pound per day and uses no more than 50 gallons of fuel per day.	5/3/2013
Storage of odorants for natural gas, propane, or oil with a holding capacity of less than 950 liters (251 gallons) and associated transfer and control equipment.	5/3/2013
Tar Pots or Tar Kettles, with a maximum holding capacity equal to or greater than 600 liters (159 gallons) but no more than 3,785 liters (1,000 gallons) and are equipped with burner(s) designed to fire exclusively on liquefied petroleum gases.	5/3/2013

Thanks again,

Carol Kaufman
 Air Quality Program Manager
 Metropolitan Water District of Southern California
 700 North Alameda Street
 Los Angeles, CA 90012
 213-217-6207
 FAX 213-217-6700
 Cell 310-850-6105



It's everyone's turn.
bewaterwise.com

From: Tracy Walters [<mailto:twalters@mdaqmd.ca.gov>]
Sent: Tuesday, April 26, 2016 11:54 AM
To: Kaufman, Carol Y
Subject: Rule 219

Good Morning Carol,

I mentioned your question about the steam cleaning exemption to Alan, and he said yes, diesel would not be exempt unless under 50 hp.

Tracy Walters, R.E.H.S.
Lead Air Quality Planner
(760) 245-1661 x6122
www.mdaqmd.ca.gov

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4. District response to MWD email

1. Diesel burner would not have been exempt and will continue to not be exempt.

5. MWD email comment, May 13, 2016

Tracy Walters

From: Kaufman,Carol Y <cykaufman@mwdh2o.com>
Sent: Friday, May 13, 2016 9:50 AM
To: Alan De Salvio
Cc: Tracy Walters; Guillory,Dan; Bell,Janet J; Fang,Anthony C
Subject: Proposed Amendments to MDAQMD Rule 219, Questions re: Steam Cleaners and Plasma Arc Cutters
Attachments: SCAQMD Rule 219 Staff Report 2013-may3-028.pdf

Hi Alan,

This is a follow-up to our recent discussions regarding the proposed amendments to MDAQMD Rule 219, Equipment Not Requiring a Permit. We greatly appreciate the inclusion of the permitting provisions for the spray coating equipment to recognize the properties of high viscosity coatings, in alignment with the existing SCAQMD rules. In a separate e-mail, we have provided 2015 usage data for the applicable Scotchkote 323 coating.

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→ As we have discussed, we also would like to clarify the intent of the rulemaking to capture the following equipment:

1. Steam cleaners possessing diesel burners. Three such steam cleaners have been identified at our Desert facilities located within MDAQMD's jurisdiction. The steam cleaners have diesel burners ranging from 300,000 to 500,000 Btu/hr, and are each used less than 50 hours per year.
2. Plasma arc cutters used to cut other metals besides stainless steel, such as mild and carbon steel (which may possibly contain small quantities of chromium, lead, nickel, etc.). In reviewing the 5/3/2013 SCAQMD Proposed Amended Rule 219 Staff Report when the inclusion of "...alloys containing cadmium, chromium, lead, manganese or nickel..." was first adopted into their Rule 219, the regulatory discussion focused on laser cutting operations rather than plasma arc cutting (copy of staff report attached, relevant excerpts provided below). Therefore, it is not clear whether the original intent in the 5/3/2013 SCAQMD Rule 219 amendments was to capture the plasma arc cutting of the alloys.

Laser cutting etching and engraving equipment and associated controls (219(e)(8))

LASER – Light Amplification by Stimulated Emission of Radiation – is a process where light energy is converted into heat energy that is focused into a point, or laser beam, which is directed onto the working surface of an object. The laser beam of a laser cutting machine melts, burns, vaporizes away or blows away the material with a jet of gas which provides a desirable high quality surface finish on materials such as flat sheet metal. There are three types of laser cutters that are used in industrial manufacturing applications:

1. The CO₂ laser is used to cut, bore, and engrave materials such as mild steel, aluminum, stainless steel, titanium, paper, wax, plastics, wood, and fabrics.
2. The neodymium (Nd) laser provides high-energy pulsing low repetition speeds and is typically used for boring.
3. The neodymium yttrium-aluminum-garnet (Nd-YAG) laser, which provides very high-energy pulsing and is used for boring, engraving, and trimming operations.

Laser etching or engraving equipment is commonly used on metals, plastics, wood, and any other surface that can be etched or engraved. The laser beam etches or engraves by heating up the surface of the object so that the surface of the material will either vaporize or surface fracture resulting in the desired engraving on the surface of the object. Staff has observed several industries that use laser etching or engraving in place of the more conventional mechanical etching and engraving. The laser etching or engraving equipment is offered in many sizes, based on maximum power output, with many of the units being very small and thus a small emissions source. The emissions inventory for 31 permitted laser engravers and etchers shows 3.0 pounds per day of particulate matter, less than 10 microns (PM₁₀). In addition, the 5 permitted laser cutters shows 1.9 pounds per day of PM₁₀ and combined, laser cutters, engravers and etchers account for 4.9 pounds of PM₁₀ per day. These 36 laser cutters, engravers and etchers do not process certain metals such as stainless steel, or alloyed materials that contain chromium, cadmium, nickel or lead; these metals when subjected to the intense heat of the laser flash off

Proposed Amended Rules 219 & 222

2-7

May 2015

Chapter 1: Summary of Proposed Amended Rule 219

Final Staff Report

toxic materials. Lasers that process these type metals must go through a complete engineering evaluation before a written permit is considered.

Staff is proposing to exempt a subset of laser cutting machines and laser etching and engraving machines from written permit by providing an exemption in Rule 219 paragraph (e)(8) provided they meet certain criteria. The exemption would be based on a 400 watts maximum power output and the type of working surface material. Staff is proposing to modify the current rule language in Rule 219 paragraph (e)(8) to include laser cutting and laser etching and engraving as follows: "Welding equipment, oxygen gasous fuel-cutting equipment, laser etching equipment, engraving of metal equipment and associated control equipment. This exemption does not include plasma arc-cutting equipment or laser cutting equipment that is used to cut stainless steel or alloys containing chromium, nickel, cadmium or lead, or laser cutters that are rated more than 125 amperes or more 400 watts and control equipment serving such equipment."

Thank you for your consideration of this request. We look forward to working further with you and your staff on the amendments to this significant rule.

Best Regards,

Carol Kaufman
Air Quality Program Manager
Metropolitan Water District of Southern California
700 North Alameda Street
Los Angeles, CA 90012
213-217-6207
FAX 213-217-6700
Cell 310-850-6105



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From: Kaufman,Carol Y [<mailto:cykaufman@mwdh2o.com>]
Sent: Thursday, May 05, 2016 10:37 AM
To: Tracy Walters
Cc: Alan De Salvio; Guillory,Dan; Bell,Janet J; Fang,Anthony C
Subject: RE: Rule 219 -- Steam Cleaners

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(2) Combustion and Heat Transfer Equipment, (b) General Combustion Source - Any combustion equipment that has a maximum heat input rate of less than 2,000,000 Btu (504,000 kilogram calories) per hour (gross) and is equipped to be fired exclusively with Public Utilities Commission regulated natural gas, liquefied petroleum gas or any combination thereof. The ratings of all combustion equipment used in the same process will be aggregated to determine whether this exemption applies.

If I'm reading the existing rule properly, this latter exemption would also have covered a < 2 MBtu diesel burner that would have been used to generate the steam. However, with the proposed wording in the Rule, steam cleaners with diesel burners, regardless of the Btu, will now be required to obtain a permit. Is that correct?

If this is the case, it might be helpful to consider the following: SCAQMD currently only requires a registration per Rule 222 (not a full permit) for these types of burners (see excerpt language below). However, I'm not sure how this might work with MDAQMD rules...

Rule 222 (Cont.)**(Amended May 3, 2013)**

utility, electricity or natural gas is available within a ½ mile radius, has a manufacturer's rating of 100 brake horsepower or less, and are fired exclusively on diesel #2 fuel.	
Micro-Turbines, with a rated maximum heat input capacity of 3,500,000 Btu per hour or less, provided that the cumulative power output of all such engines at a facility is less than two megawatts, and that the engines are certified at the time of manufacture with the state of California or were in operation prior to May 3, 2013.	5/3/2013
Portable Diesel Fueled Heaters, with a rated maximum heat input capacity of 250,000 Btu per hour or less and are equipped with burner(s) designed to fire exclusively on diesel #2 fuel.	5/3/2013
Power Pressure Washers and Hot Water or Steam Washers and Cleaners, that are equipped with a heater or burner that is designed to be fired on diesel fuel, has a rated maximum heat input capacity of 550,000 Btu per hour or less, is equipped with a non-resettable chronometer, and the maximum NOx emission output of the equipment is less than one pound per day and uses no more than 50 gallons of fuel per day.	5/3/2013
Storage of odorants for natural gas, propane, or oil with a holding capacity of less than 950 liters (251 gallons) and associated transfer and control equipment.	5/3/2013
Tar Pots or Tar Kettles, with a maximum holding capacity equal to or greater than 600 liters (159 gallons) but no more than 3,785 liters (1,000 gallons) and are equipped with burner(s) designed to fire exclusively on liquefied petroleum gases.	5/3/2013

Thanks again,

Carol Kaufman
Air Quality Program Manager
Metropolitan Water District of Southern California
700 North Alameda Street
Los Angeles, CA 90012
213-217-6207
FAX 213-217-6700
Cell 310-850-6105



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From: Tracy Walters [<mailto:twalters@mdaqmd.ca.gov>]
Sent: Tuesday, April 26, 2016 11:54 AM
To: Kaufman, Carol Y
Subject: Rule 219

Good Morning Carol,

I mentioned your question about the steam cleaning exemption to Alan, and he said yes, diesel would not be exempt unless under 50 hp.

Tracy Walters, R.E.H.S.
Lead Air Quality Planner
(760) 245-1661 x6122
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5. District response to MWD email

1. The District's intent is to require permitting for significant sources of air pollution inadvertently exempted by current Rule 219, such as large boilers dedicated to steam cleaners and plasma arc cutters releasing non-negligible toxic air contaminants. My current position is to not require permits for your identified small, low-use diesel steam cleaners (however, I recommend MWD maintain records of annual use to support the low-use claim). With regards to plasma arc cutters the word alloy is not defined, and my recommendation is to not require permits for any plasma arc cutter without explicit knowledge of operation on stainless steel or other alloy whose cadmium, chromium, lead, manganese or nickel content at or above stainless steel levels (10% in the case of chromium). Again, I recommend MWD maintain records of the nature of materials processed by plasma arc cutter to support exemption.

6. EPA email comment, May 13, 2016

Tracy Walters

From: Maurin, Lawrence <Maurin.Lawrence@epa.gov>
Sent: Friday, May 13, 2016 1:20 PM
To: Tracy Walters
Cc: Yannayon, Laura
Subject: RE: Proposed Amendment of MDAQMD Rule 219 - Equipment Not Requiring a Permit

Hi Tracy,

Thank you for the opportunity to review a pre-adoption draft of the proposed amendments to MDAQMD Rule 219. We had a chance to look at the changes that the District has proposed. We have no objections to the proposed changes, and the proposed changes adequately address our comments.

We did want to clarify one portion of the SIP History in the Staff Report. While the 10/23/2000 version of Rule 219 was federally approved for the purposes of the MDAQMD title V program, it was not approved into the California SIP. The latest version of Rule 219 which has been approved into the SIP for the San Bernardino County portion of MDAQMD was approved on 11/09/1978 for SoCal APCD. For the Riverside County Portion of MDAQMD, the latest version of Rule 219 approved in the SIP was approved 07/06/1982 for South Coast AQMD. We will be evaluating the new submittal of Rule 219 for approval into the SIP against both the 1978 SoCal APCD approval for San Bernardino County and the 1982 South Coast AQMD approval for Riverside County.

Please let us know if you receive any significant public comments at the public hearing on May 23rd or if you revise the rule any further.

Larry

Larry Maurin
Air Permits Office (AIR-3)
U.S. Environmental Protection Agency, Region 9
75 Hawthorne Street
San Francisco, CA 94105
(415) 972-3943 (phone) / (415) 947-3579 (fax)
Maurin.Lawrence@epa.gov

From: Tracy Walters [<mailto:twalters@mdaqmd.ca.gov>]
Sent: Thursday, April 07, 2016 4:09 PM
To: Steckel, Andrew <Steckel.Andrew@epa.gov>
Cc: Maurin, Lawrence <Maurin.Lawrence@epa.gov>
Subject: Proposed Amendment of MDAQMD Rule 219 - Equipment Not Requiring a Permit

Good Afternoon,

The Mojave Desert Air Quality Management District (MDAQMD) is proposing to amend Rule 219 – *Equipment Not Requiring a Permit*. The amendment of Rule 219 is necessary to address a more detailed interpretation by the California Air Resources Board of Senate Bill 700 of 2003 (Health & Safety (H&S) Code §§40724-40724.7) provisions, and to update

Rule 219 provisions applying to steam cleaning, welding, abrasive blasting, and coating or adhesive application or laminating equipment.

Please direct any questions or written comments regarding the proposed rule no later than May 19, 2016 to Tracy Walters at 760-245-1661 ext. 6122.

Thank you for your consideration.

Sincerely,

Tracy Walters, R.E.H.S.
Lead Air Quality Planner
(760) 245-1661 x6122
www.mdaqmd.ca.gov

6. District response to EPA email

1. District Rule 219 was approved as part of the MDAQMD Title V program at 40 CFR, Appendix A, California (q)(2) (66 FR 63503, 12/17/01). USEPA has consistently insisted that this approval renders these rules “federally enforceable” for purposes of citation and enforcement. If this is no longer the case, the District requests to be informed immediately as a variety of rules will need to be SIP submitted and acted upon by USEPA in an expeditious manner.

7. Lockheed comment, May 19, 2016



Lockheed Martin Aeronautics Company
1011 Lockheed Way, Mail Zone 0824
Palmdale, CA 93599

Kevin J. Dykema, Manager
Environment, Safety & Health

In reply, please refer to ENV 0519/034

Ms. Tracy Walters
Lead AQ Planner
Mojave Desert Air Quality Management District
14306 Park Avenue
Victorville, CA 92392-2310

May 19, 2016

SUBJECT: Proposal to Amend Rule 219— Equipment Not Requiring a Permit

Dear Ms. Walters:

This letter provides Lockheed Martin Aeronautics Company – Palmdale (Lockheed Martin) comments on the Mojave Desert Air Quality Management District (MDAQMD) proposal to amend Rule 219— Equipment Not Requiring a Permit. MDAQMD states that the amendment of Rule 219 is necessary to update Rule 219 provisions relating to welding operations and specifically to facilities that perform plasma arc-cutting or laser cutting operations. Though the Lockheed Martin facility located in the Mojave Desert AQMD jurisdiction does not perform these operations, we are providing these comments to maintain consistency with other California jurisdictions.

The proposed change to the exemption for welding is said to reflect requirements in the Rule and Implementation Information for Nine Metal Fabrication and Finishing Area Source Categories (40 CFR 63 Subpart XXXXXX) which regulates nine (9) industrial processes, including welding. Though the rule change is said to target facilities subject to these requirements, MDAQMD's broad change to the rule, removing the blanket exemption, could affect many facilities not subject to Subpart XXXXXX.

Lockheed Martin suggests that the exemption more specifically address the sources the District is trying to capture. We propose the following change to the proposed language:

1.

Brazing, hand-held soldering, and hot air solder leveling, (but not hot-oil or vapor phase solder levelings), and control equipment venting exclusively such equipment. Welding equipment, or oxygen gaseous fuel-cutting equipment, laser etching equipment, engraving of metal equipment and associated control equipment venting such equipment. (This exemption ~~does~~ does not include facilities primarily engaged in the activities listed in 40 CFR



63.11514 performing plasma arc-cutting equipment or laser cutting equipment that is used to cut stainless steel or alloys containing cadmium, chromium, lead, manganese or nickel, or laser cutters that are with an electrical power input rated moreing greater than 400 watts 30-KVA and control equipment venting such equipment) *[Derived from SCAQMD (e)(8) and 40 CFR Part 63 National Emissions Standards for HAPs: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories.]*

We appreciate the opportunity to comment on the proposed regulation. If you have any further questions, please contact the Angelica Jackson, at (661) 572-7656.

Respectfully,



Kevin J. Dykema

KJD:acj

7. District response to Lockheed comment

1. Industry provided comment on May 19 requesting that the welding exemption be facility-based and directly reference Federal law; the District has reviewed this comment and believes the proposed equipment-based exemption is adequate.

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